

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division**

Tri-State Paper, Inc.,  <i>Debtor.</i>	Case No. 23-13237-pmm Chapter 11
Tri-State Paper, Inc.,  <i>Plaintiff,</i>  v.  Holy Tomato LLC,  <i>Defendant.</i>	Adversary No. 23-00096-pmm

**Plaintiff's Motion to Compel Discovery**

Plaintiff Tri-State Paper, Inc., through its attorney, moves this Court as follows:

1. The Clerk recently entered judgment against Defendant Holy Tomato LLC.
2. On March 15, 2024, the Plaintiff served the Defendant with the interrogatories attached as Exhibit A.
3. Because the Defendant has failed to respond to the interrogatories, the Plaintiff requests that the Court issue an order compelling the Defendant's response.
4. The Plaintiff requests that the Court grant this motion without a hearing as allowed by L.B.R. 9014-2(13).

For those reasons, the Court must grant relief in the form of order attached, and further in the Plaintiff's favor if necessary and proper under the law.

Date: May 28, 2024

CIBIK LAW, P.C.  
*Attorney for Plaintiff*

By: 

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### **Certificate of Service**

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: May 28, 2024



Mike Assad